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December 31, 2019

BY ECF

Honorable Cheryl L. Pollak
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Martinez v. City of New York*, 16 CV 79 (AMD) (CLP)

Your Honor:

I represent plaintiff in the above-referenced action. I write with defendants' consent to respectfully request adjustment of the expert schedule set at the last conference to allow the parties to exchange police practices expert disclosures.

At the last conference, the Court set a schedule for expert exchanges whereby plaintiff's disclosures are to be served today and defendants are to conduct an IME and limited supplemental deposition of the plaintiff, as well as serve their expert disclosures, by the end of February. *See* order dated December 16, 2019.

As ordered, plaintiff will make her expert medical disclosures today and does not seek alteration of the existing schedule as outlined above. However, to assist the trier of fact in determining liability, plaintiff would like to retain a police practices expert. Accordingly, upon consultation with opposing counsel, plaintiff respectfully requests, on consent, that the Court review and endorse the following schedule:

- Plaintiff to designate police practices expert and serve disclosures by January 31, 2020; and
- Defendants to designate rebuttal expert and serve disclosures by March 2, 2020.

Hon. Cheryl L. Pollak
Dec. 31, 2019

Thank you for your consideration of this request.

Respectfully submitted,



Gabriel P. Harvis

cc: All Counsel